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### **Remarks/Arguments**

Claims 40-43, 47, and 49-69 are pending in the application. For at least the reasons stated below, Applicant asserts that all claims are now in condition for allowance.

**1. The references fail to teach all of the limitations of the independent claim.**

The Examiner rejects claim 40 and 70 under 35 USA 103(a) as being unpatentable over Chelliah (5,710,887), in view of Inland Revenue Agency ("IRA"), further in view of Tax Forms ("TForms").

As was explained on page 12 of the previous Response, claim 70 combines all of the limitations of claim 40 as well as those found in claims 44, 45, 46 and 48. The present amendments cancel claim 70 and expand claim 40 to include former claim 70's elements. As their limitations are now in claim 40, the claims 44, 45, 46 and 48 have also been canceled.

The Applicant disagrees with the Examiner and now asserts that the cited references fail to teach or suggest all of the limitations of claim 40. The claim requires a business-to-government system. The system-user logs onto the system and represents the business that wishes to communicate with a certain government agency. Element (i) requires that the system's user interface is customized according to which government agency the user is communicating with. Thus, when the user/business is filing taxes with the IRS, the user interface is set up for IRS requirements. Then when the user/business is filing a report with the FDA, the user interface is set up for FDA requirements.

The Examiner asserts that Chelliah teaches a type of customization at column 9 line 64 through column 10 line 2 as well as column 12 lines 34-42. Applicant disagrees. On page 8 of the Office action, the Examiner states that he interprets the cited portions of Chelliah as "targeting customer based on customer profile" by "display[ing] information using narrowcasting to target the customer". Applicant agrees that the two portions of Chelliah have some support for this interpretation by the Examiner. The portion beginning at column 9 line 64 discusses how figure 2 illustrates that a participant/customer 12 is represented by a participant program object 112. This object 112 includes customer information, such as the customer's name, address, and demographic data.

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The portion of Chelliah cited in column 12 discusses how this customer/participant 12 enters an electronic storefront and is presented with "narrowcast advertising targeted at the customer ... based on the customer's demographics or purchasing habits." As one skilled in the art recognizes, narrowcasting is the act of sending data to a specific list of recipients. for example, Webopedia.com's entry for "narrowcasting" supports this. Those skilled in the art recognize that "narrowcasting" is used to describe how advertising and other marketing content is pushed specifically to a relevant customer/user. Indeed, Chelliah supports this notion that narrowcasting is traditionally referred to in the sense of targeted marketing: Chelliah's promotions subsystem is the module which narrowcasts its information (i.e., marketing advertising information) to the user. The promotions are matched to the customer by looking at the customer's demographics and purchasing habits.

The present invention does not deal with narrowcasting of personalized ads. Rather, element (i) requires: "customizing the user interface to determine which government agencies with which to communicate." The invention determines which government agency the business user wishes to interact with and then displays a user interface screen appropriate for that agency. For example, when the business user is interacting with the IRS, the IRS user interface is shown to the user. When the business user is interacting with the FDA, the FDA user interface is shown to the user. This aspect of the invention is not the narrowcasting as narrowcasting is understood by those skilled in the art and as it is illustrated and discussed in Chelliah. Therefore, Applicant requests that the rejection to the independent claim be withdrawn.

## **2. Conclusion**

Applicant submits that for at least the above-identified reasons, all pending claims are allowable over the art of record and respectfully requests that a Notice of Allowance be issued in this case. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (612) 607-7508. If any fees are due in connection with the filing of this paper, then the Commissioner is authorized to

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charge such fees including fees for any extension of time, to Deposit Account No. 50-1901  
(Docket 60021-305107).

Respectfully submitted,



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